

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ALYSSA LLOYD,

Plaintiff,

14-CV-9968 (GHW)(SN)

- against -

THE CITY OF NEW YORK, CORIZON HEALTH,
INC., JAMES RUFLE, UNDERCOVER OFFICER
137, PAUL BYRNE, GREGORY GRAVES, DAVID
MILLS, MOHAMMED ALAM, JOHN/JANE DOES,
Nos. 1-25 (members of the New York City Police
Department and New York City Department of Corrections
whose names are presently unknown to plaintiff), and
JOHN/JANE ROES, Nos. 1-25 (employees or agents of
Corizon Health, Inc., whose names are presently unknown
to plaintiff),

Defendants.

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**DECLARATION OF ANA MARIA VIZZO, ESQ. IN SUPPORT OF
DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

ANA MARIA VIZZO declares under the penalty of perjury as follows:

1. I am a Partner in the law firm of Heidell, Pittoni, Murphy & Bach, LLP, attorneys for CORIZON HEALTH, INC. ("Corizon") and MOHAMMED ALAM ("Dr. Alam") (collectively referred to hereinafter as "the medical defendants") in the above-captioned matter. As such, I am fully familiar with all of the proceedings had herein. I submit this Declaration in Support of Defendants' Motion for Summary Judgment pursuant to Federal Rule of Civil Procedure 56.

2. Annexed as Exhibits A to V are true and complete copies of documents which are relied upon and cited in the medical defendants' Statement of Undisputed Facts pursuant to Local Rule 56.1, the affidavits of the medical defendants' experts, and the medical defendants' Memorandum of Law accompanying this motion:

- A. Docket Sheet for 14-cv-9968.
- B. Amended Complaint dated May 8, 2015.
- C. Answers for all defendants.
- D. Notice of Appearance for Ana Maria Vizzo dated January 12, 2016.
- E. Unredacted medical records of Correctional Health Services.
- F. Long Island Plastic Surgery Group, P.C. medical records.
- G. New York Hospital Queens medical records.
- H. Wound Care Referral records.
- I. New York Presbyterian Weill Cornell Medical Center records.
- J. Walgreen's Pharmacy records.
- K. Plaintiff's Responses and Objections to Defendants' Request for Admissions, Requests for Production of Documents, and Second Set of Interrogatories.
- L. Affidavit of Thomas Hayden.
- M. Plaintiff's Disclosure of Expert Testimony.
- N. Plaintiff's Supplemental Disclosure of Expert Testimony.
- O. Expert Disclosure and Report of William Samson, M.D., F.A.C.S.
- P. Expert Affirmation of William Samson, M.D., F.A.C.S.
- Q. 50-h testimony of Alyssa Lloyd.

- R. Deposition testimony of Alyssa Lloyd.
 - S. Transcript of Alyssa Lloyd's Arraignment.
 - T. Deposition testimony of Mohammed Alam, M.D.
 - U. Deposition testimony of Jerry Chang, M.D.
 - V. Stipulation and Order of Dismissal.
3. As set forth in Defendants' Memorandum of Law dated August 26, 2016,

the medical defendants are entitled to Summary Judgment dismissal of the Amended Complaint pursuant to Federal Rule of Civil Procedure 56.

Dated: New York, New York
August 26, 2016



Ana Maria Vizzo (AV 5647)